REMARKS

Claims 1-23 were presented for examination in the present application and remain pending upon entry of the instant amendment.

Applicants thank the Examiner for the indication of allowable subject matter in claims 3-5 and 7-8. Claims 3 and 5 have been amended into independent form, namely to include the elements of independent claim 1. Thus, claims 3-5 and 8 are in condition for issuance.

Claim 1 has been amended to correct and obvious error, namely to change "detecting" to "detects." It is submitted that this amendment merely makes explicit what had been implicit in the claim. Reconsideration and withdrawal of the objection to claim 1 are respectfully requested.

Claims 9-23 were rejected under 35 U.S.C. §112, second paragraph.

Claim 9 recites, in pertinent part, that the core module and the input/output module are "configured to communicate with a plurality of peripherals having similar and/or dissimilar data (emphasis added)."

The Office Action asserts that the term "similar and/or dissimilar data" is a relative term.

Applicants respectfully traverse this assertion.

The term "similar" in the preamble of a claim that was directed to a nozzle "for high-pressure cleaning units or similar apparatus" was held to be indefinite since it was not clear what applicant intended to cover by the recitation "similar" apparatus. *Ex parte Kristensen*, 10 USPQ2d 1701 (Bd. Pat. App. & Inter. 1989).

It is respectfully submitted that the term "similar and/or dissimilar" as recited by claim 9 is not a relative term as in *Kristensen*. In *Kristensen*, the claim recites a specific apparatus (e.g., high-pressure cleaning units) and then relates this specific apparatus to other "similar "apparatuses.

In contrast, claim 9 recites a configuration for a core module and an input/output module. Here, these components are "configured to communicate with a plurality of peripherals," where the data coming from this plurality of peripherals can be "similar" and/or "dissimilar."

The present application provides that:

> Advantageously, base 12 provides modular device 10 with an open communication architecture to allow numerous different types of peripherals 14 to be incorporated into the modular device. For example, base 12 is capable of joining peripherals 14 that do not normally communicate with one another such as an access control peripheral and a video surveillance peripheral (not shown). As such, base 12 provides an integration platform for modular device 10 that enables the modular device to accept a wide array of data (e.g., access control data, smoke alarm data, intrusion alert data, employee time card data, etc) in a single, unified device. Specifically, the data, control, and monitoring activities of each peripheral 14 are centralized through base 12. As such, base 12 can provide modular device 10 with the ability to modify the decisions of the individual peripherals 14 based, at least in part, on data from other, similar or dissimilar peripherals. See paragraph [0017].

It is respectfully submitted that it is clear what the Applicants intended to cover by the "similar and/or dissimilar" recitation, namely the elements of claim 9 modify the configuration of the core module and the input/output module, where this configuration is such that the modules can communicate with a plurality of peripheral even though these peripherals may be communicating various forms of data.

The Office Action further asserts that the "similar and/or dissimilar data" term does not limit the claim to any specific forms of data (emphasis added).

Applicants agree. In claim 9, Applicants intended to cover no specific forms of data. Rather, the core module and the input/output module recited by claim 9 are "configured to communicate with a plurality of peripherals", where the data coming from this plurality of peripherals may have many different forms (e.g., access control data, smoke alarm data, intrusion alert data, employee time card data, etc.). The configuration of the core module and the input/output module is such that the form and/or content of the data from the peripherals are simply not relevant.

Accordingly, reconsideration and withdrawal of the rejection to claims 9-23 are respectfully requested.

Claims 1, 2, and 6 were rejected under 35 U.S.C. §103(a) over U.S. Patent No. 5,938,472 to Yuen et al. (Yuen).

Applicants respectfully traverse this rejection.

Independent claim 1 recites that the tamper monitor detects "tampering with said first peripheral."

Yuen teaches a communication device 2 having housing 4 closed at either end by endcaps 6. A circuit board 14 is maintained in housing 4 and has electrical contact points 16, 17, 18 and 19 located to one side of the circuit board. The circuit board 14 includes thereon volatile memory associated with the contact points 16 through 19 and failure of the electrical connection between any of these contact pairs causes these critical parameters to be lost, rendering the device ineffective. Endcap 6 has conductive layers 30 that, when installed in housing 4, make the electrical connection between the electrical contact 16, 17, 18 and 19. Any attempt to remove the endcap 6 will break the electrical connection between the contact points, which effectively opens the switch and this will trigger a circuit causing encryption keys and critical data in the system to be destroyed. This structure makes an arrangement that is fast to react if attempts are made to remove the endcaps. See col. 3, lines 1-65.

Importantly, Yuen teaches that the circuit board 14 includes ports 9 and 10, which are accessible through gaps 11 provided in the endcap 6. See col. 2, lines 55-56.

The Office Action asserts that peripherals would be connected to ports 9 and 10. See page 3, lines 18-21 of the Office Action dated February 25, 2005.

It is respectfully submitted that any "peripheral devices" connected to ports 9 and 10 of Yuen can be "tampered with" without removing the endcaps 6 of Yuen. For example, any "peripheral device" connected to ports 9 and 10 of Yuen could be removed without removing the endcaps 6 by simply removing any connector inserted into ports 9 and 10. In addition, any "peripheral device" connected to ports 9 and 10 of Yuen could be destroyed (e.g, hit with a hammer) without removing the endcaps 6. Moreover, the endcaps 6 of Yuen can be removed without disconnecting the "peripheral devices" from ports 9 and 10.

Thus, endcaps 6 do not detect tampering with the "peripheral devices" connected to ports 9 and 10. Rather, the system of Yuen merely detects removal of the endcaps 6 and, thus the system of Yuen is limited to detecting tampering with communication device 2 and, not, anything connected via ports 9 and 10.

Accordingly, it is respectfully submitted that the system of Yuen, which merely detects tampering with the base communication device 2, does not disclose or suggest the simple system of claim 1 that includes a tamper monitor that detects "tampering with said first peripheral."

Claim 1 is therefore believed to be in condition for allowance. Claims 2, 6, and 8 are also believed to be in condition for allowance for at least the reason that they depend from allowable claim 1. According, reconsideration and withdrawal of the rejection to claims 1, 2, and 6 are respectfully requested.

In view of the above, it is respectfully submitted that the present application is in condition for allowance. Such action is solicited.

If for any reason the Examiner feels that consultation with Applicants' attorney would be helpful in the advancement of the prosecution, the Examiner is invited to call the telephone number below.

Respectfully submitted,

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